

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**MONICA ABBoud**, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

**AGENTRA, LLC,**

*Defendant.*

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**Case No. 3:19-cv-00120-X**

**DEFENDANT’S AMENDED TRIAL WITNESS LIST**

Pursuant to Fed. R. Civ. P. 26 and the Court’s Amended Scheduling Order [Dkt. 76], Defendant Agentra, LLC hereby serves its witness list on Plaintiff Monica Abboud. Included are names of witnesses who Defendant expects to call and names of witnesses who Defendant may call if the need arises:

Expect to call:

Monica Abboud  
34 Hollingers Island  
Katy, TX 77450

Ms. Abboud is the named plaintiff in this case and will be called to testify regarding the phone calls she allegedly received and her interactions with Agentra. Ms. Abboud was not deposed in the case.

May call:

Cindy Dale  
Vice President, Lindsey Health/Agentra  
4201 Spring Valley Road  
Dallas, TX 75244

Ms. Dale is the Vice President of Administration for Agentra, and was Agentra’s Rule 30(b)(6) designee. Ms. Dale may testify regarding the process that an independent contractor of

Agentra signs up new customers and Agentra's evidence of prior express consent. Ms. Dale was deposed in this case.

Defendant reserves the right to call rebuttal witnesses as circumstances at trial dictate.

Defendant reserves the right to amend this witness list should additional witnesses be identified through outstanding documents not yet produced. Further, Defendant reserves the right to call any and all witnesses designated and/or called by Plaintiff in this matter.

Dated: October 31, 2022

Respectfully submitted,

/s/ William S. Richmond  
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**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned counsel for Defendant Agentra, LLC does hereby certify that this pleading was served on counsel of record on October 31, 2022 by electronic filing.

/s/ William S. Richmond  
William S. Richmond

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

MONICA ABBOUD, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

AGENTRA, LLC, a Texas limited liability  
company,

Defendant.

Case No. 3:19-cv-00120-X

**PLAINTIFF'S WITNESS LIST**

Pursuant to Fed. R. Civ. P. 26 and the Court's Amended Scheduling Order, Plaintiff Monica Abboud hereby serves its witness list on Defendant Agentra, LLC. Included are names of witnesses who Plaintiff expects to call and names of witnesses who Plaintiff may call if the need arises:

Expect to call:

Cindy Dale  
Vice President, Lindsey Health/Agentra  
4201 Spring Valley Road  
Dallas, TX 75244

Ms. Dale is the Vice President of Administration for Agentra, and was Agentra's Rule 30(b)(6) designee. Ms. Dale is expected to testify regarding certain matters relevant to the case, including Agentra's CRM system, its claim to have secured prior express consent to send the text messages at issue, Agentra's evidence of prior express consent, the process by which Abboud's credit card was charged by Agentra, whether Abboud enrolled in an Agentra plan, and Agentra's oversight of its downline agents. Ms. Dale was deposed in this case.

Todd Dunayer  
Chief Technology Officer, Lindsey Health/Agentra  
4201 Spring Valley Road

Dallas, TX 75244

Mr. Dunayer is Agentra's Chief Technology Officer. He was identified during the Rule 30(b)(6) deposition as the person who manages the internal CRM system from which the text messages at issue originated. Mr. Dunayer is expected to testify regarding the functionality of the system. Mr. Dunayer was not deposed in the case.

Expect to call:

Jake Gabbard  
Stellar Communications Partners, Inc. d/b/a Healthcare Enrollment Center  
1260 HUNTINGTON DR STE 205  
SOUTH PASADENA, CA, 91030

Mr. Gabbard is a key executive with one of the third parties involved in the calls at issue in this case. He is expected to testify regarding the calls placed Abboud, the functionality of Stellar's dialing system, and its relationship with Agentra.

May call:

Monica Abboud  
34 Hollingers Island  
Katy, TX 77450

Ms. Abboud is the named plaintiff in this case and may be called to testify regarding her interactions with Agentra which gave rise to the text messages at issue. Ms. Abboud was not deposed in the case.

DATED: October 31, 2022

Respectfully submitted,  
By: /s/ Patrick H. Peluso

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*Attorneys for Plaintiffs*

*\*Pro Hac Vice*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via Court's ECF system on October 31, 2022.

/s/ Patrick H. Peluso  
Patrick H. Peluso